

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HUAWEI TECHNOLOGIES CO. LTD.,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC., et al.

Defendants.

No. 2:20-cv-030-JRG

Jury Trial Demanded

VERIZON BUSINESS NETWORK
SERVICES, INC., et al.

Counterclaim-Plaintiffs,

v.

HUAWEI TECHNOLOGIES CO. LTD.,
et al.

Counterclaim-Defendants.

HUAWEI NOTICE UNDER 35 U.S.C. § 282

Huawei Technologies Co. Ltd., Huawei Technologies USA, Inc., and Futurewei Technologies Inc. (collectively “Huawei”) hereby provide notice pursuant to 35 U.S.C. § 282 that they may rely at trial, a bench trial, or motion for judgement as a matter of law in this action on one or more of (i) the patents and publications listed below as showing the state of the art or otherwise supporting the subject matter ineligibility of the asserted claims of U.S. Patent Nos. 8,121,111 and 8,983,288 (“Verizon Asserted Patents”).

Author	Title	Date	Bates Number
ITU-T	ITU-T G.709/Y.1331 Recommendation	03/2003	HW-EDTX-00243826 or HW-EDTX-00612331
IEEE	IEEE Standard 1588-2002, “Standard for a Precision Clock Synchronization Protocol for Networked Measurement and Control Systems”	11/2002	HW-EDTX-00005295
NIST	NISTIR 7302 “Proceedings of the 2005 Conference on IEEE 1588 Standard for a Precision Clock Synchronization Protocol for Networked Measurement and Control Systems”	12/2005	HW-EDTX-00005565
M. Laulainen et al	U.S. Patent No. 9,088,376	Filed 10/2007	HW-EDTX-00091372
M. Laulainen et al	U.S. Provisional Application No. 66/829,982	Filed 10/2006	HW-EDTX-00209297
M. Ghodrati et al	U.S. Patent Publication No. 2008/0151941	Filed 12/2006	HW-EDTX-00091360
J. Edison	IEEE 1588: An Update on The Standard and Its Application, 38th Annual Precise Time and Time Interval (PTI) Meeting	12/2006	HW-EDTX-00909158
J. Ferrant	Synchronisation in Telecom Networks	11/2006	HW-EDTX-00016573
Tellabs Oy	Supporting Time synchronization (time-of-day) across a transmission network	10/2006	HW-EDTX-00006100
Y. Ofek et al	U.S. Patent Publication No. 2002/0018475	Published 02/2002	HW-EDTX-00091490
K. Edmison et al	U.S. Patent Publication	Published 06/2003	HW-EDTX-00091631

In addition, Huawei may rely on the knowledge and expert testimony of Dr. Jose Melendez as set forth in his expert report on invalidity dated February 18, 2021, and the references cited therein, including the file histories of the Verizon Asserted Patents.

Dated: June 9, 2021

Respectfully submitted,

/s/ Jason D. Cassady

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COUNTERCLAIM DEFENDANT HUAWEI**

**TECHNOLOGIES CO., LTD. AND
COUNTERCLAIM DEFENDANTS HUAWEI
TECHNOLOGIES USA, INC. AND
FUTUREWEI TECHNOLOGIES, INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that counsel of record is being served with a copy of the foregoing document via the Court's electronic filing system on this 9th day of June, 2021.

/s/ Jason D. Cassady
Jason D. Cassady